

EXHIBIT E

Letter from Duane Morris to Cleary Gottlieb, dated Jan. 10, 2020

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January 10, 2020

Via E-mail

Jeffrey A. Rosenthal, Esquire
Lisa M. Schweitzer, Esquire
Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, NY 10006

Re: BSG Resources Limited (in administration); Case No.: 19-11845 (SHL)

Dear Counsel:

We write on behalf of William Callewaert and Malcolm Cohen, in their capacity as Joint Administrators and Foreign Representatives (together, the “Joint Administrators”) for the debtor BSG Resources Limited (in administration) (“BSGR”). This letter supplements the Joint Administrators’ discovery status report dated December 3, 2019 (as supplemented, the “December 3 Status Report”) and is intended to provide a brief update as to the additional documents produced this week in response to the document requests (the “Vale Document Requests”) served by Vale S.A. (“Vale”).

I. Completed Production – Week Ending January 10, 2020

The Joint Administrators completed the following production to Vale during the week ending January 10, 2020:

January 8, 2020 – JA0130113 to JA0130354 (23 documents; 242 pages) including third-party correspondences concerning document requests.

To date, the Joint Administrators have produced a total of 17,161 documents in response to the Vale Document Request. This includes 52 documents provided to the Joint Administrators by Beny Steinmetz.

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On January 6, 2020, the Joint Administrators also delivered to Vale a supplemental privilege log identifying documents withheld from production made between December 13, 2019 and January 3, 2020.

II. Supplemental Production Efforts

Translation of foreign language documents is underway. The Joint Administrators do not have a current estimate as to when translation of the foreign language documents will be complete, but will provide an update when such estimate is available.

III. Third-Party Documents

The Joint Administrators have requested documents from third-parties as described in the December 3 Status Report, updated as follows:

- *Nysco Management Corp.* On January 9, 2020, the Joint Administrators sent a letter to Nysco repeating the Joint Administrators' prior request that Nysco provide any responsive documents in its possession to the Joint Administrators. The Joint Administrators have not received a response to this correspondence.
- *Dag Cramer.* On January 9, 2020, the Joint Administrators sent a letter to Mr. Cramer repeating the Joint Administrators' prior request that Mr. Cramer provide any responsive documents in his possession (on behalf of himself, BSGR or Oynx) to the Joint Administrators. The Joint Administrators have not received a response to this correspondence.
- *Sandra Merloni-Horemans.* On January 8, 2020, counsel to the Joint Administrators sent a follow-up email to Ms. Merloni-Horemans inquiring as to the status of any responsive documents in here possession. The Joint Administrators have not received a response to this correspondence.
- *Balda Foundation.* On January 7, 2020, the Joint Administrators sent letters to Balda, care of both Peter Goop and Marc Bonnant, repeating the Joint Administrators' prior request that Balda provide any responsive documents in its possession to the Joint Administrators. The Joint Administrators have not received any response to these correspondences.

Copies of these correspondences will be processed for production and produced.

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IV. Conclusion

The Joint Administrators' production is materially complete. As evidenced above, the Joint Administrators continue to supplement that production in good faith and consistent with their obligations under the applicable discovery rules.

Very truly yours,

/s/ Frederick D. Hyman

Frederick D. (Rick) Hyman